

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

ALL CASES

Case No. 23-md-03084-CRB

**AFFIDAVIT OF TIFFANY R. ELLIS IN
SUPPORT OF PLAINTIFFS' LIST OF
DISPUTED ENTRIES FOR SPECIAL
MASTER REVIEW**

Judge: Honorable Barbara S. Jones

1 I, Tiffany R. Ellis, hereby declare as follows:

2 1. I am a partner of Peiffer Wolf Care Kane Conway & Wise, an attorney licensed in
3 the States of Michigan and Illinois and duly admitted to practice before this Court, representing
4 Plaintiffs in the above caption action.

5 2. I submit this declaration in support of Plaintiffs' List of Disputed Entries for
6 Special Master Review on April 21, 2025.

7 3. Plaintiffs incorporate the Discovery Letter Brief Regarding Disputed Entries for
8 Special Master Review filed by All Plaintiffs on March 4, 2025. *See* ECF No. 2434. Plaintiffs
9 incorporate the brief to support the specific reasons each entry on the List of Disputed Entries
10 was challenged. The Brief included the general background of the privilege dispute process to
11 date, the legal standard for Plaintiffs raising challenges to Defendants' privilege log entries, and a
12 general argument for the challenges Plaintiffs raised.

13 4. The List of Disputed Entries for Special Master Review Plaintiffs provided on
14 April 21, 2025 contained entries still in dispute for custodian Sachin Kansal.

15 5. The List of Disputed Entries for Special Master Review Plaintiffs provided on
16 April 21, 2025 did not contain any entries for the custodians that overlapped with custodians
17 already submitted to the Special Master for review.

18 **Sachin Kansal**

19 6. Defendants included approximately 835 entries for Sachin Kansal across its
20 Tranche 1, Tranche 2, Tranche 3, and Tranche 4 privilege logs.

21 7. Plaintiffs originally challenged approximately 266 of these 835 entries.

22 8. As of January 31, 2025¹, Defendants withdrew their claim of privilege to 12
23 entries in full and 40 entries in part.

24 9. On March 10, 2025, Defendants provided Plaintiffs with a revised privilege log
25 after Defendants re-reviewed all entries in dispute pursuant to Master Order No. 2. Defendants
26 withdrew their claim of privilege to 117 entries in full and 112 entries in part.

27 _____
28 ¹ Defendants provided Plaintiffs a revised privilege log on January 31, 2025. This was the last revised privilege log
Defendants provided before they started providing revised privilege logs in accordance with the Master Order No. 2.
See ECF No. 2357.

